

E. KATE PATCHEN (NYRN 4104634)
ALBERT B. SAMBAT (CSBN 236472)
MICHAEL A. RABKIN (ILRN 6293597)
U.S. Department of Justice
Antitrust Division
450 Golden Gate Avenue
Box 36046, Room 10-0101
San Francisco, CA 94102
Telephone: (415) 934-5300
michael.rabkin@usdoj.gov

Attorneys for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA

v.

RAMIN RAD (“RAY”) YEGANEH,
Defendant.

No. CR 15-00339 PJH

STIPULATION AND PROTECTIVE
ORDER RE: DISSEMINATION OF
DISCOVERY MATERIALS

IT IS HEREBY STIPULATED AND AGREED among the parties that the documents provided as discovery in this case to defense counsel are subject to a Protective Order. The defendant is charged with bid rigging and conspiracy to commit mail fraud related to non-judicial public foreclosure auctions in Alameda County.

The parties agree that discovery in this case contains “Protected Materials,” which are defined here as reports of interviews, grand jury testimony, documents produced to the grand jury or its agents, documents seized pursuant to a search warrant, documents voluntarily provided to the government, and victim and witness social security numbers, driver’s license numbers, dates of birth, addresses, telephone numbers, and email addresses. The Protective Order signed in this case extends to all Protected Materials provided, including those concerning conduct not directly charged in the Indictment.

1 By signing this Stipulation, defense counsel agrees that the Protected Materials are being
2 entrusted to counsel only for the purpose of representing the defendant in this criminal case.
3 Further, defense counsel agrees not to share any Protected Materials with anyone other than
4 designated defense investigators, experts, support staff, and certain non-parties, as described
5 below. Defense counsel may permit the defendant to review the Protected Materials and be
6 aware of their contents, but the defendant shall not be provided any copies of the Protected
7 Materials that have not been redacted to remove confidential information, which includes but is
8 not limited to dates of birth; social security numbers; credit card, bank account, or other financial
9 account numbers; and driver's license numbers. It shall not be necessary for defense counsel to
10 redact any confidential information where the defendant is the author, addressee, or recipient of
11 the document, as indicated on the face of the document. Any person receiving Protected
12 Materials or a copy of Protected Materials from defense counsel shall be bound by the same
13 obligations as counsel and further may not give the Protected Materials to anyone (except that
14 the protected documents shall be returned to counsel).

15 Defendant and his counsel agree not to show to any non-parties copies of the Protected
16 Materials that have not been redacted to remove confidential information, or to provide copies to
17 non-parties except as needed for the defense or prosecution of the criminal action, and only if the
18 non-party signs the attached Acknowledgement of Protective Order. If defendant or his counsel
19 wishes to utilize the services of any non-party, including but not limited to an investigator,
20 expert, or other individual, to review the Protected Materials in connection with the preparation
21 of a defense, prior to receiving access to the materials, such individual must sign a copy of the
22 Acknowledgment of Protective Order attached to a copy of this Order.

23 Notwithstanding the foregoing, after the trial date has been confirmed in this case,
24 counsel, staff, and/or the investigators for the defendant may make copies of the Protected
25 Materials for trial preparation and presentation. Any copies must, however, remain in the
26 possession of counsel, investigator, staff, expert, or the Court.

27 //

28 //

1 In the event that defendant substitutes counsel, undersigned defense counsel agrees to
2 withhold these documents from new counsel unless and until substituted counsel agrees in
3 writing also to be bound by this Order.

4
5 Dated: July 13, 2015

/s/

6 NED SMOCK
7 Assistant Federal Public Defender
8 Office of the Federal Public Defender
9 Northern District of California
Attorney for Ramin Rad ("Ray") Yeganeh

10 Dated: July 13, 2015

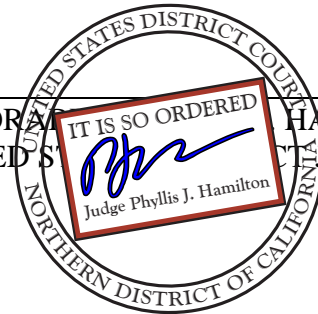
/s/

11 MICHAEL A. RABKIN
12 E. KATE PATCHEN
13 ALBERT B. SAMBAT
14 Trial Attorneys
15 Antitrust Division
United States Department of Justice

16 IT IS SO ORDERED:

17
18 Dated: July 14, 2015

19 HONORABLE PHYLIS J. HAMILTON
20 UNITED STATES DISTRICT JUDGE



ACKNOWLEDGMENT OF PROTECTIVE ORDER

The undersigned hereby acknowledges that he or she has received a copy of the Stipulation and Protective Order Re: Dissemination of Discovery Materials (“Protective Order”) issued in *United States v. Ramin Rad (“Ray”) Yeganeh*, CR 15-00339 PJH (N.D. Cal.); has read, understands, and agrees to the terms of the Protective Order; and hereby submits to the jurisdiction of the United States District Court for the Northern District of California for the purposes of enforcement of the terms of the Protective Order and the punishment of any violations thereof.

DATED: _____

Signature

Printed Name

Street Address

City, State, and Zip Code

Area Code/Telephone Number